

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PETER AND KATHERINE VONBANK)	
Plaintiff)	
v.)	
JEFFREY AND RENAE SERSLAND, et al.)	Civil Action No.:
Defendants)	07-40205-FDS

Rule 26 Automatic Disclosure of the Plaintiffs,
Peter and Katherine Von Bank

The Plaintiffs, Peter and Katherine Von Bank, hereby makes the following disclosure pursuant to Local Rule 26.2 and Federal Rules of Civil Procedure, 26(a)(1):

A. Rule 26(a)(1)(A)

In accordance with Local Rule 26(a)(1)(A), requiring disclosure of individuals, other than opposing parties, likely to have discoverable information that the Plaintiff may use to support its claims at trial, the Plaintiff identifies the following, who are all likely to have knowledge concerning the finances and operation of Medical University of the Americas-Belize. The first four witnesses named below, as well as the students yet to be named, also have knowledge concerning the deterioration of the school up to the present day. Such deterioration includes the physical campus of the school, as well as its ability to provide educational opportunities to its students. The students who will be named at a later date are those who have complained to the Plaintiffs, or their attorneys, concerning an inability to receive the benefit of their bargain, including the inability to obtain transcripts:

1. Peter and Katherine Von Bank
Shakopee, Wisconsin
2. Norman Hans Rechsteiner
Wendy Rechsteiner
N6142 Little Valley Road
Spooner, WI 54801
3. Timothy Jeffers
Banana Beach Resort, Box 94,
San Pedro, Ambergris Caye, Belize
4. Gregory Bowman
Will supplement with address

5. David Fredrick, Ph.D.
EIC Holding, Inc.
P.O. Box 386
Gardner, MA 01440
6. Various current and former students
of the Defendant MUA-Belize

The Plaintiffs will supplement this list when more witnesses are identified through the discovery process.

B. Rule 26(a)(1)(B)

In accordance with Local Rule 26(a)(1)(C), requiring disclosure of documents that are in the possession, custody or control of the Plaintiff and that the Plaintiff may use to support its claim, the Plaintiff refers the Defendants to the following:

1. The Memorandum of Association, MUA-Belize, Ltd.
2. Corporate Records, State of Wisconsin, MUA-Belize, LLC.
3. The Belize Companies Act, Chapter 250
4. Articles in Business North Exclusives (copy of which will be sent herewith).
5. Demand for Shareholders Meeting, dated 4/11/2007.
6. Clerk's Certificates, Action of Directors and Action of Shareholders, dated May 7, 2007.
7. Notice to Cease and Desist, send to David Gill, Ph.D. and Jeffrey Sersland, dated June 13, 2007.
8. 2004 brochure of MUA-Belize, funded by the Plaintiffs.
9. Various pages from MUA-Belize Web Site
10. Sersland Trust Settlement, June 1, 2004
11. Letter from David Gill, Ph.D. to Kenneth I. Gordon, dated July 17, 2007.

12. Copy of share certificates of MUA-B of the Plaintiffs and David Fredrick. Ph.D.

13. Promissory Note, dated October 27, 2005, from Jeffrey and Renae Sersland to the Plaintiffs in the amount of \$1.8 million.

14. Correspondence between the Serslands and the Von Banks, including accounting of the use of the \$1.8 million by the Serslands and/or MUA-Belize.

15. Resolution of MUA-Belize, Ltd. naming Katherine Von Bank a Director.

16. Various photographs of MUA Belize circa February, 2008, taken by the Plaintiffs (will be sent herewith).

17. Correspondence and bank records regarding the Von Bank's loan to and monitoring of their loan to the Serslands and security in MUA-Belize (will be sent herewith).

C. Rule 26(a)(1)(C)

In accordance with Local Rule 26(a)(2)(C), requiring a calculation of damages sought in this matter and the identification of documents in support of the Plaintiff's damages claim, the Plaintiff points to the Promissory Note in the amount of \$1.8 million as the calculation of damages in this matter. The Plaintiffs also point out that as unconditional owners of shares of MUA-Belize, as they were purchased from a third party, they also claim as additional loss some portion of the diminution of value of MUA-Belize during the time it was owned and/or operated by the Serslands and David Gill, Ph.D.

D. Rule 26(a)(1)(D)

Not applicable.

Dated: March 8, 2008

Peter and Katherine Von Bank
by their Attorney,

/s/ Kenneth I. Gordon
Kenneth I. Gordon, BBO# 556762
GORDON LAW OFFICE
63 Chatham Street
Boston, MA 02109
(617) 742-4602

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CERTIFICATE OF SERVICE

I, Kenneth I. Gordon, certify that I have provided a copy of these Automatic Disclosure, as well as the documents identified as attached thereto, to the Defendants Jeffrey Sersland and David Gill, Ph.D., who have responded to the Complaint in this matter, by the Court's electronic filing system and in the case of the documents by email, this 8th day of March, 2008.

A handwritten signature in black ink, appearing to read 'K. Gordon', is written over a horizontal line.

Kenneth I. Gordon